Attachment 3

Draft letter to U.S. Army Corps of Engineers Requesting Determination on 404 Permit

Mr. Terry McKee
Department of the Army
Corps of Engineers, Omaha District
Tri-Lakes Project Office
9307 State Highway 121
Littleton, CO 80123-6901

Dear Mr. McKee:

The Department of Energy (DOE) is forwarding the attached information to your office for a determination as to whether the project described in the information falls under the Nationwide Section 404 Permit, or if a separate Section 404 permit is required for the project. In addition, if your office determines that a separate Section 404 permit is required, you are requested to consider the attached information as an application for such a permit.

The material being forwarded describes the project and includes a maps showing the location of the project and a drawing providing more detailed information.

Project Description

The Department of Energy (DOE) proposes to construct a remedial action involving construction of a system to collect, pump and treat groundwater at the 881 Hillside (Operable Unit 1) at the Rocky Flats Plant north of Golden, CO. Construction of the groundwater collection system will temporarily destroy up to approximately 1500 feet of the South Interceptor Ditch (SID), a man-made feature itself part of remedial action. The SID is located on the 881 Hillside above Woman Creek and was built to collect potentially-contaminated surface water and transport it to Pond C-2 for subsequent treatment and release to local drainages. Wetland vegetation has become established at intermittent locations in the SID where pools of standing water remain for sufficient periods of time. The SID wetlands were identified in *Wetlands Assessment, Rocky Flats Site*, EG&G, April 1990. Wetland area in the length of the SID from a point south of 881 Building to C-2 Pond is approximately 0.15 acres (*Environmental Assessment for 881 Hillside [High Priority Sites] Interim Remedial Action*, page 4-6, USDOE, January, 1990); approximately half that amount will be affected by the proposed action.

The proposed action is construction of a French Drain upslope of the SID and approximately 2500 feet in length, installation of pumps and water transmission lines, and construction of a treatment plant and storage tanks. A trench will be dug down to bedrock across the 881 Hillside roughly parallel to the SID. The French Drain piping will be laid in the trench and an impermeable liner will be installed on the down-gradient side of the pipe prior to backfilling of the trench. The sides of the trench will be sloped to prevent caving during construction. For a distance of up to approximately 1500 feet, the trench and SID are close enough that the sloped excavation of the trench will overlap the SID, requiring the temporary destruction of that portion of the SID and the attendant wetlands.

The water collected by the French Drain, most of which does not now enter the SID, will be pumped through a buried pipe directly up the 881 Hillside approximately 900 feet to a collection tank. From the tank, it will flow to an adjacent treatment facility and, after treatment, into a post-

treatment holding tank. A second buried pipe will return the water to the SID at a point south of the 881 Building.

Wetlands Effects

The project will temporarily destroy up to approximately 1500 linear feet of wetlands in the SID. The natural and beneficial values of the small area of wetlands destroyed will be lost during construction of the French Drain (summer, 1991, through spring, 1992). Upon completion of construction, the SID will be rebuilt in the same location as it presently exists. DOE proposes to allow the wetlands to re-establish themselves. This is expected to occur by the same mechanism by which the wetlands originally established themselves in the SID after it was first constructed. Upon re-establishment, all the natural and beneficial values of the wetlands are expected to return to the same extent, or greater, than they presently exist with wetlands of similar quality and survival potential. No permanent loss of wetlands is expected to occur as a result of the project. Operation of the project may, in fact, enhance future wetlands by virtue of increasing average flows and reducing the seasonality of such flows in the SID.

During construction of the French Drain, a bypass will be built to conduct SID flows around the project area, protecting the normal supply of water to SID wetlands downstream of the construction site. Thus, the downstream wetlands should not be affected by the project.

Maps and Drawings

Attached are maps and drawings showing the location and details of the proposed project and location of wetlands in the project area.

Map 1 is a photocopy of a portion of the Louisville, Colorado, quadrangle map showing the location of the Rocky Flats Plant (RFP), and the 881 Hillside. As indicated on the map, the project is to be located in section 11, Range 2 South, Township 70 West, Jefferson County, Colorado.

Map 2 is of the 881 Hillside area and shows in more detail the locations of the South Interceptor Ditch as it crosses the Hillside and of Woman Creek.

Map 3 is a photocopy of a detail of a larger map showing wetlands at the RFP. The portion shown is of the project area. This map is from *Wetlands Assessment, Rocky Flats Site*, EG&G, April 1990. On this map is marked the approximate extent of the South Interceptor Ditch and wetlands that will be temporarily destroyed.

Drawing 1 is a detailed site plan for the water collection and treatment system, showing the components of the system, the locations of the South Interceptor Ditch and the French Drain, and the reach of the South Interceptor Ditch that will be affected by the project.

Please call Tom Olsen of my staff at 966-2762 if you need further information or have any questions.

Robert M. Nelson, Jr.
Manager
DOE, RFO